

**Before the
Federal Communications Commission
Washington D.C. 20554**

In the Matter of

| | |
|----------------------------------------|-------------------------------|
| Numbering Resource Optimization |) |
| |) CC Docket No. 99-200 |
| National Thousands-Block |) |
| Number Pooling Rollout Schedule |) |

COMMENTS OF THE TENNESSEE REGULATORY AUTHORITY

Introduction and Summary

The Tennessee Regulatory Authority is filing comments with the Federal Communications Commission Common Carrier Bureau ("FCC") in response to the Public Notice released on October 17, 2001, Subject: The Common Carrier Bureau Seeks comment on the National Thousands-Block Number Pooling Rollout Schedule, FCC 00-104 CC Docket 99-200 (Hereafter referred to as the "Order"). The Tennessee Regulatory Authority ("TRA" or "Authority") applauds the FCC for its work in number conservation. The FCC has shown a sincere effort in working with the states in spirit of federalism recommended by Congress on dealing with telecommunications issues. With regard to number conservation, the FCC has frequently delegated to the states number conservation authority to deal with numbering issues unique to each state. For example, the FCC delegated authority to Tennessee to implement one thousands-block pooling trials in the 615 and 901 NPAs¹.

The cooperative efforts of the states and the federal government have borne fruit in that better utilization of our nation's numbering resources is taking place. With this instant notice, the FCC has taken the next logical step in addressing our nation's numbering dilemma by establishing a national schedule for the roll out of thousands-block pooling. But the TRA suggests that the time for cooperation, as best defined in the term federalism, has not ended in regard number pooling. In fact, implementation issues will require the FCC and the states to work even closer to address yet unforeseen problems. Specifically, the FCC should permit states the flexibility to make minor alterations in the national pooling schedule by substituting pooling within their state's NPAs when they feel that justification exists. This flexibility will permit states to partner with the FCC to ensure that pooling is conducted where it is most needed within the state to better conserve our nation's numbering resources.

¹ DA 01-656, dated March 14, 2001, and DA 00-1616, dated July 20, 2000, respectively.

Additionally, the FCC should address the NPAs where interim pooling authority has been granted to states, but for unforeseen technical difficulties have not been able to implement thousands-block pooling. The TRA recommends that the FCC direct its National Pooling Administrator to give this small number of NPAs priority in the national rollout schedule.

Background and Discussion

One good example of why states need the flexibility to alter the national thousands-block pooling schedule is our experience with interim thousand-block pooling. The TRA has continued to take several steps to further area code conservation measures in Tennessee. Among those steps was the appointment of a Number Conservation Task Force ("Task Force") made up of representatives from the wireline and wireless industries along with representation from the TRA Staff.² On December 27, 1999, the Task Force issued its industry consensus report (Attachment A) to the TRA and made the following recommendation on implementation of pooling:

...[T]he TRA deferred implementing an area code relief plan for 615 due to reclamation of unused NXX codes and an overall decrease in the demand for codes. Based upon this decision and the analysis of all known Number Conservation Measures being implemented and/or evaluated across the nation, the Tennessee Number Conservation Task Force recommends Thousand Block Pooling, Thousand Block Management, and All Services Overlay as the most effective means for conservation of numbering resources in Tennessee.³

and,

...[I]t is recommended that Release 3.0, the national standard, be used for any implementation of number pooling in the State of Tennessee. Release 1.4 is not recommended because of the near term availability of Release 3.0 and the unnecessary costs that would be borne by Tennessee consumers for implementation of both releases.⁴

On June 14, 1999, the TRA was notified by the North American Numbering Plan Administration ("NANPA") that area code relief was necessary for the 615 NPA in Tennessee. On July 27, 1999, the planning for relief of the 615 NPA by either a geographic split or an all services overlay began with notification of the industry's recommendations. The decision on the method of area code relief for the 615 NPA was deferred on December 7, 1999, after the NANPA notified the TRA that reclamation activities and a decrease in central office code demands had extended the life of the 615 NPA until the first quarter of 2003.⁵

² The Authority commissioned the Tennessee Telecommunications Association ("TTA") to form the Task Force on February 2, 1999, for the purpose of researching options and measures that may be taken for numbering resource conservation.

³ Report and Recommendations of the Number Conservation Task Force To The Tennessee Regulatory Authority Regarding Number Conservation Measures For The State Of Tennessee, p. 32 (December 27, 1999).

⁴ *Id* at p. 33.

⁵ NeuStar (NANPA) letter, dated December 2, 1999, Subject: Relief of the Tennessee 615 area code.

On November 16, 1999, the TRA petitioned the FCC for additional delegated authority to implement numbering conservation measures. This petition requested the delegated authority to implement five (5) specific numbering conservation measures as listed below:

1. Enforcement of current numbering allocation standards and establishment and enforcement of new standards;
2. Setting fill rates and requiring utilization surveys;
3. Reclamation of unused and reserved NXX codes and portions of those codes;
4. Ordering of number utilization and forecasting reporting and audit such reporting; and
5. Implementation of mandatory thousands-block number pooling.

In January 2000, the NANPA again notified the TRA that relief planning was necessary. This notification was to provide for relief of the 901 NPA in Tennessee and the planning for the requisite relief strategy decision commenced. On March 16, 2000, the NANPA code administrator declared the 901 NPA to be in jeopardy due to an unforeseen increase in the demand for central office codes. As a result, jeopardy procedures were initiated for the 901 NPA.

On March 31, 2000, the FCC released its much anticipated *Report and Order and Further Notice of Proposed Rule Making*, Docket No. 99-200, FCC 00-104 (hereafter referred to as the Order) on Numbering Resource Optimization. Among the actions taken by the FCC in this Order was the additional requirement cited in Paragraph 170 that States with pending petitions for delegated authority demonstrate: “1) that an NPA in its state is in jeopardy, 2) the NPA in question has a remaining life span of at least a year and 3) that the NPA is in one of the largest 100 MSAs, or alternatively, the majority of the wireline carriers in the NPA are Local Number Portability (“LNP”) capable.” The TRA submitted the required supplemental information to the FCC on April 24, 2000, demonstrating that the 901 NPA met all requirements for additional delegated authority to implement numbering conservation measures.

On July 14, 2000, the NANPA informed the TRA that the 615 NPA had been declared to be in jeopardy due to the demand for central office codes increasing significantly beyond the normal forecast. The FCC granted the TRA’s November 16, 2000, petition for delegated authority allowing Tennessee to implement thousands-block number pooling in the 901 NPA on July 20, 2000, with the release of DA 00-1616. Shortly thereafter, the TRA filed the required supplemental information with the FCC to begin thousands-block pooling in the 615 NPA.

Based upon the belief that the FCC would approve its petition for the 615 NPA, and in an effort to improve number efficiency within the jeopardy-declared 615 NPA, the Authority began the necessary work to implement interim pooling in the 901 and 615 NPAs and issued its Pooling Order on December 12, 2000. (Attachment B)

The TRA’s Order provided for the selection of a Pooling Administrator, specified the method to be used for pooling, and set the implementation dates. The specified method was selected based on the industry’s recommendation as set forth in the Tennessee Numbering Conservation Task Force’s report. That report demonstrated the industry’s overwhelming support for implementing pooling using release 3.0 and the FCC’s established national standard of utilization of methods

that used Efficient Data Representation (“EDR”) specified in paragraph 177. Although, in its Order the FCC did not endorse release 3.0, it did establish that T1S1.6 Technical Requirements would be the technical standard for a National one thousands-block number pooling mechanism. Taking into account this technical capability, and the addition of preventing extra costs to the consumer in eliminating a conversion from 1.4 to 3.0, the Authority ordered that pooling would be implemented using release 3.0. Considering the proposed release date of 3.0, the Authority set March 1, 2001, or the availability of release 3.0, whichever is later, as the date for pooling implementation in the 615 NPA.

On March 1, 2001, the implementation of pooling had to be delayed in the 615 NPA due to unforeseen delays in the release of 3.0, caused by technical problems which are well known by the FCC and will not be discussed here. The release of 3.0 has still not occurred due to these problems and the pooling trial in the 615 NPA continues to be delayed.

National Thousands-Block Number Pooling Rollout Schedule

The National Thousands-Block Number Pooling Schedule has two (2) deficiencies. First, as stated earlier, no consideration is given to NPAs where interim pooling authority was granted to states but not implemented due to circumstances beyond the control of states. Second, states are not granted the flexibility to switch pooling in NPAs within the state when special circumstances, as mentioned above, occur. A national schedule without such flexibility unduly ties the hands of the states from being able to adjust to special circumstances.

The first deficiency should be addressed by the FCC directing the National Pooling Administrator to work with those states that have been granted interim pooling authority to determine whether all the interim pooling trials have been completed. If there are any pooling trials that have been delayed, the National Pooling Administrator should be directed to work with those states to prioritize the yet to be completed pooling trials. These NPAs should be prioritized in the national rollout schedule because they have been determined by the FCC to be uniquely qualified for thousands-block pooling. This action will better ensure that pooling will occur where it is most needed. It will also ensure that no NPA, especially those in jeopardy, is ignored in the national rollout schedule.

The second deficiency is the need for the continuation of the partnership between the states and the federal government on number conservation. The example of Tennessee’s interim pooling effort points out that problems inevitably occur and flexibility is needed to address new situations.

Conclusion

The Tennessee Regulatory Authority has been very active in pursuing numbering resource conservation. The unforeseen delay in implementing the one thousands-block pooling in the 615 and 901 NPAs has been caused by the unavailability of release 3.0 and the national pooling standard of Efficient Data Representation for one thousand-block pooling. The National Pooling Administrator has stated to the TRA staff that one thousands-block pooling will begin, according

to the rollout schedule, without EDR and by utilizing release 1.4 if the 3.1 release has not been implemented.⁶

The 615 and 901 NPAs are ready for thousands-block pooling. All steps outlined in the Industry Numbering Committee One-Thousand Block Pooling Guidelines have been taken in both the 615 and the 901 NPA to implement pooling, with the exception of the industry block donations, which can be quickly accomplished after verification of the posted utilization forecast. If pooling is not implemented in a timely manner, the 615 NPA may exhaust and area code relief will have to be implemented unnecessarily. The time is also ripe for pooling in the 901 NPA. The TRA has recently ordered area code relief for the 901 NPA and the benefits of thousands-block pooling can best be achieved in newly relieved NPAs. For these reasons, the TRA respectfully requests that the 615 and 901 NPAs be prioritized by the National Pooling Administrator and be added to the pooling schedule for the first quarter of 2002.

A jeopardy situation still exists in Tennessee's 615 area code which may adversely affect competing carriers and their ability to obtain needed numbering resources at a time when they need such resources to compete in the telecommunications marketplace. If the above request cannot be granted by the FCC, it is requested that the rollout schedule for the 865 NPA be substituted with the 615 NPA and that pooling begin in the 615 NPA, Nashville MSA in the second quarter of the rollout schedule. By substituting the 865 NPA with 615 NPA, the exhaust of the 615 NPA could likely be delayed several years and conserve an already depleting numbering resource by preventing the need for area code relief. This action would resolve the present situation in the 615 NPA quicker than any other action available. The 865 and 901 NPAs should be placed on the next available opening on the national schedule.

Thank you for your favorable consideration of these filed comments to the Thousands-Block Number Pooling Rollout Schedule, CC Docket No. 99-200.

Respectfully Submitted,



K. David Waddell
Executive Secretary
Tennessee Regulatory Authority

November 6, 2001

⁶ On October 16, 2001, the Local Number Portability Working Group reported that the current implementation date for release 3.1, or "patch" as it is being called, which is supposed to correct the problems that are occurring with 3.0 is not likely until the second quarter of 2002 for Region 4, which contains Tennessee. By the time 3.1 is implemented, even if it is correction for the problems with 3.0, the National Rollout for pooling will have started and pooling trials cannot be implemented by the individuals states.



Tennessee
Telecommunications
Association

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228 CAPITOL BOULEVARD, SUITE 212 NASHVILLE, TN 37219 P: 615.256.8005 F: 615.244.4803 E: tta@dtccom.net

December 27, 1999

VIA HAND DELIVERY

Mr. David Waddell, Executive Secretary
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, Tennessee 37243-0505

RE: The Report and Recommendation of the Tennessee Number Conservation Task Force Regarding Number Conservation Measures for the State of Tennessee

Dear Mr. Waddell:

Enclosed are the original and five copies of the Report and Recommendation of the Tennessee Number Conservation Task Force Regarding Number Conservation Measures for the State of Tennessee.

We would like to request an opportunity to formally present our report and recommendations to the Directors in early January.

Very truly yours,

Ellen Bryson
Task Group Chair

Enclosures

CC: Number Conservation Task Group Members
TTA Board Members

ATTACHMENT

A

REPORT AND RECOMMENDATIONS OF THE
NUMBER CONSERVATION TASK FORCE
TO THE
TENNESSEE REGULATORY AUTHORITY

REGARDING NUMBER
CONSERVATION MEASURES FOR THE STATE OF
TENNESSEE

DECEMBER 30, 1999

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ENCLOSURE

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EXECUTIVE SUMMARY

The Number Conservation Task Force was commissioned by the Tennessee Regulatory Authority ("Authority" or "TRA") at its regularly scheduled conference on February 2, 1999. The Task Force, chaired by the Tennessee Telecommunications Association ("TTA"), began its work immediately and held its first meeting on March 16, 1999. The Task Force considered actions of the Federal Communications Commission and state Public Utility Commissions, organizations evaluating national solutions to numbering issues, and Tennessee specific number utilization in developing the Task Force recommended action to insure adequate numbering resources are available to telecommunications carriers on a competitively neutral basis.

The following report includes summaries of the federal and state actions through December 2, 1999. Additionally, the report outlines number conservation measures evaluated by the Task Force that are not recommended for Tennessee, or could be beneficial to Tennessee, but for which further research or study of the conservation measure is warranted.

The Task Force reached consensus¹ to recommend that the Authority incorporate three elements into its approach to maximizing number conservation in Tennessee:

1. Use of national standards for Thousand Block Number Pooling will maximize the effectiveness of number conservation.
2. In preparation for number pooling, the TRA should order service providers to implement Thousand Block Management to preserve uncontaminated thousand blocks that currently exist.
3. When NPA relief is necessary, the TRA should order relief using an All Services Overlay.²

¹ The Task Force relied on the industry definition of consensus as defined in ATIS/ING guideline INC-0404-016. **Definition of Consensus:** Consensus is established when substantial agreement has been reached among interest groups participating in the consideration of the subject at hand. Interest groups are those materially affected by the outcome of the result. Substantial agreement means more than a simple majority, but not necessarily unanimity.

² This view is not shared by the TRA Staff participants. The Staff believes that relief plans should be evaluated on a case-by-case basis, as has been done in Tennessee.

INTRODUCTION

At a regularly scheduled conference on February 2, 1999, the Authority commissioned the Tennessee Telecommunications Association to form an industry Task Force and submit a report and recommendations regarding number conservation in Tennessee. The purpose of the recommended number conservation measures is to extend the expected life span of Tennessee's area codes.

The Task Force was formed and is chaired by the TTA. The membership consists of wireline (both Incumbent Local Exchange Carriers and Competitive Local Exchange Carriers) and wireless service providers, and TRA Staff. (*See Attachment 1*).

The Task Force examined numerous state petitions requesting additional authority to implement number conservation measures as well as applicable Federal Communications Commission ("FCC") Orders,³ the FCC's Number Resource Optimization-Working Group report and the FCC's Notice of Proposed Rule Making, CC Docket 99-200. The Task Force made an early determination that specific knowledge was needed on the numbering utilization posture for each area code in the state in order to make solid recommendations on which number conservation measures would achieve the goal of extending the life expectancy of Tennessee's area codes. To obtain the information required, a data request was developed and sent to all service providers (regulated and non-regulated) holding NXX codes (telephone prefix numbers) and doing business in Tennessee for their voluntary participation. The data request was both mailed and posted on the TRA Webpage. Approximately 40 percent of the carriers that were surveyed responded.

³ The most important FCC guideline for number conservation is CC Docket No. 96-98, Petition for Declaratory Ruling and Request for Expedited Action on the July 15, 1997 Order of the Pennsylvania Public Utility Commission Regarding Area Codes 412, 610, 215, and 717, September 28, 1998, referred to as the "Pennsylvania Order."

Due to the sensitive and proprietary nature of the information requested in the data request, the Task Force formed a consensus that the TTA should enter into a Non-Disclosure Contract with a third party for the collection and aggregation by area code of all submitted data. The North American Numbering Plan Administrator and the National Regulatory Research Institute ("NRRI") were contacted to determine their interest in compiling the survey. A contractual agreement was reached with the NRRI on August 19, 1999 to compile the survey results and provide its analysis. The NRRI submitted its report to the TTA on telephone number utilization in Tennessee in November 1999. The aggregated data and NRRI generic recommendations received by the TTA provide an important component of the foundation for this report.

DEFINITIONS/ACRONYMS

As a starting point the Tennessee Number Conservation Task Force began by reviewing number optimization methods that were included in the October 20, 1998 report of the Numbering Resource Optimization Working Group⁴. Our recommendations regarding these methods will be addressed in later sections of this report. Following is a definition of the methods reviewed:

Definitions:

- **Rate Center Consolidation** – The combination of two or more contiguous rate centers of an individual service provider into one rate center.
- **Extended Local Calling** – The ability for CMRS (Commercial Mobile Radio Service) carriers to extend local inbound calling over a wider geographic area without the use of additional NXXs.
- **Inconsistent Rate Centers** – The ability for a service provider to draw rate center boundaries different than the incumbent and/or other service providers in the LATA.
- **Individual Telephone Number Pooling** – The allocation of individual telephone numbers from a common pool(s) by a neutral administrator using Location Routing Number/Local Number Portability (LRN LNP).
- **Thousands Block Number Pooling** – The allocation of telephone numbers in blocks of 1000 from a common pool(s) by a neutral administrator using Location Routing Number/Local Number Portability (LRN LNP).
- **Unassigned Number Pooling** – The transfer of telephone numbers from one service provider's inventory to another service provider under the direction of a neutral coordinator, using Location Routing Number/Local Number Portability (LRN LNP).
- **Location Portability** – The ability for a customer to retain a number when moving to another location outside the original rate area.

⁴ Number Resource Optimization Working Group, Report to North American Numbering Council, October 20, 1998.

- **NXX Code Sharing** – Division of an NXX Code among two or more service providers using 7 Digit routing in switches.
- **Code Sharing Using Route Indexing** – Division of an NXX Code among multiple service providers using the Route Indexing form of Interim Local Number Portability.
- **Mandatory 10 Digit Dialing** – The requirement that all calls in the North American Numbering Plan, whether local or long distance, be dialed using the 3 digit area code and 7 digit phone number. This method includes the potential expansion of the d digit to include 0 and/or 1 (i.e. NPA-0XX-XXXX or NPA-1XX-XXXX).
- **Modification of Central Office, CO, Code Assignment Guidelines** – Proposed changes to CO code guidelines that help to ensure prudent use of NANP resources.
- **All Services Overlay** – Addition of a new NPA serving the same geographic area as the existing NPA.
 - **Retroactive Overlay** – Consolidation of two or more NPAs by elimination of a previous split boundary.
 - **Expanded Overlay** – Creation of an overlay based on the Basic Trading Area (BTA), the Metropolitan Trading Area (MTA), or other boundaries not on the existing boundaries of the NPA being relieved.
 - **Specialized Overlay** – Creation of an overlay for service providers who fail to meet, or are exempt from, specific technical requirements.
- **Geographic Splits** – The division of an NPA area into multiple areas, each served by its own NPA..
- **NXX Voluntary Allocation Plan** – Voluntary allocation/rationing plan for NXX code assignment.

Acronyms:

- ALTS – Alliance for Telecommunication Industry Solutions
- BTA – Basic Trading Area
- CMRS – Commercial Mobile Radio Service

- INC – Industry Numbering Committee
- LLC – Limited Liability Company
- LNP – Local Number Portability
- LNPA – Local Number Portability Administrator
- LRN – Location Routing Number
- LSMS – Local Service Management System
- MSA – Metropolitan Statistical Area
- MTA – Metropolitan Trading Area
- NANC – North American Numbering Council
- NANP – North American Numbering Plan
- NPA – Numbering Plan Area
- NANPA – North American Numbering Plan Administrator
- NPAC – Number Portability Administration Center
- NRRI – National Regulatory Research Institute
- OSS – Operational Support Systems
- PUC – Public Utilities Commission
- SCP – Service Control Point
- SOA – Service Order Administration
- SP – Service Provider
- SS7 – Signaling System 7

HISTORY

Federal Status

Section 251(e)(1) of the Telecommunications Act of 1996 gives the FCC plenary jurisdiction over numbering issues. The FCC may delegate authority to states, but retains jurisdiction over all matters it does not specifically delegate.⁵

On September 28, 1998, the FCC released an Order addressing a Petition for Declaratory Ruling challenging an Order of the Pennsylvania Public Utility Commission concerning area code relief. In this Order, the FCC established principles that industry, state commissions, and the FCC should work together to conserve numbers and promote their efficient use. The FCC delegated additional authority to states that allows them to order NXX code rationing in conjunction with area code relief decisions when jeopardy has been declared only when the carriers operating in the area have been unable to reach consensus on a rationing plan to extend the life of an area code, until implementation of relief. Industry guidelines define jeopardy as that time when the forecasted or actual demand for NXX resources will exceed the known supply during the planning and implementation interval for area code relief. As determined in the Pennsylvania Numbering Order, state commissions may not use rationing as a substitute for area code relief. Code rationing plans can only be ordered by a state commission if they have decided on a specific form of area code relief (split, overlay, etc.), they have established an implementation date for that relief, and the industry is unable to reach consensus on a rationing plan (*see* Pennsylvania Order).

Since the release of this Order, many state commissions have petitioned the FCC for additional authority in the face of mounting number shortages. As of December 2, 1999, the

⁵ FCC, Numbering Resource Optimization, paragraph 16.

FCC has released orders granting additional number authority to the California, Connecticut, Florida, Maine, Massachusetts, New Hampshire, New York, Ohio, Texas, and Wisconsin state commissions. The authority granted individually to these states is temporary, pending release of the FCC Number Optimization Order (CC Docket 99-200) which is expected by the end of the first quarter 2000. Each state must abide by the same principles that NANC is governed by, ensuring that numbers are made available on an equitable basis and in a timely manner. These states have been granted additional authority to conduct mandatory thousand-block number pooling trials with Local Number Portability (LNP) capable carriers. Non-LNP capable carriers may not be included in such trials. All state's requests to expand LNP capability to non-LNP capable carriers in order to implement number pooling have been denied. States were granted the authority, for pooling trials, to reclaim unused thousands blocks as well as unused and reserved NXX codes, and to require sequential number assignment according to industry guidelines. States must also determine the method of cost recovery for number pooling. The FCC encouraged states to consider rate center consolidation prior to implementing pooling and reminded them they currently have authority to order this. Finally, states were not granted authority to order unassigned number porting, individual telephone number pooling trials, or the expansion of local number portability.

The FCC's Number Optimization NPRM was released June 2, 1999, and addresses a host of issues related to the efficient use of numbers, and optimization of their use. Issues addressed by this NPRM include definitions of categories of number use, need for numbers, reporting and record keeping, audits, reclamation of NXX blocks, cost recovery, rate center consolidation, mandatory ten digit dialing, and implementation of number pooling. Generally it is expected that the FCC's decision in this docket will line up with its prior decisions in its orders on the state

petitions for additional numbering authority, but they are, of course, free to change their positions.

On October 21, 1999, Congressional conferees voted out an appropriations bill for the Departments of Commerce, State and Justice that said "the conferees are aware that the Commission has issued a notice of proposed rulemaking to assist the state public utility commissions in their efforts to conserve numbers in specific area codes. The Commission anticipates issuing an order by the end of first quarter 2000. The conferees expect the Commission to keep to this schedule and issue a final order on area code conservation measures no later than March 31, 2000."⁶

The current rules regarding state authority on numbering and area code relief are contained in the FCC's Code of Federal Regulations 47, Part 52, at www.fcc.gov/searchtools.html.

State Status

(NUMBER CONSERVATION PROJECTS IN OTHER STATES AS OF DECEMBER 2, 1999)

Arizona:

The Arizona Corporation Commission ("ACC") issued an order on December 22, 1998 asking the industry to submit a study on number conservation. That study was filed with the Arizona Task Force on July 28, 1999. It explored the benefits and limitations of several number conservation measures including individual telephone number pooling; thousand block pooling; central office code sharing; unassigned number porting; eliminating reliance on ILEC rate

⁶ National Regulatory Research Institute (NRRI) Report to the Tennessee Telecommunications Association, "Telephone Number Use in Tennessee," November 1999, page 5, Actions at the State and Federal Level.

centers for pooling areas; rate center consolidation; and architecture for inclusion of resources of non-participants.

The Arizona Task Force made several recommendations. First, the report recommended the industry develop a consensus on a relief method for the 520 NPA as well as expediting the entire relief process. Second, depending on the nature of the approved relief plan, the report recommended that the ACC order the Arizona Task Force to develop plans for implementing rate center consolidation, the return of unused NXX codes by service providers, and the voluntary use of unassigned number porting and central office code sharing. It noted that all number conservation plans must comply with current and forthcoming FCC Orders on number conservation methods. As of December 2, 1999, the ACC has not taken action on the Task Force recommendation.

California:

On September 15, 1999, the FCC adopted an Order partially granting additional numbering authority to the California Public Utilities Commission ("CA PUC") and distinctly noting that it granted this authority on an interim basis, and the forthcoming Order in the Numbering Resource Optimization proceeding will supersede all issued waivers. The numbering authority granted to the CA PUC included authority to: implement 1000-block pooling; establish usage thresholds; reclaim unused and reserved NXX codes; require sequential number assignment; and hear non-rationing procedure claims. It also reaffirmed its previous Order allowing pre-NPA relief plan rationing. Authority to implement individual telephone number pooling was denied.

To date, the CA PUC has ordered implementation of 1000-block pooling in the 310 NPA with an effective date of March 18, 2000. The CA PUC is also considering pooling in additional

NPA's. CA continues to examine other measures that they have been given authority to implement. The Commission has also reversed all of its ordered overlay relief plans and replaced these Orders with a plan for pooling with back-up geographic split area code relief plans.

Connecticut:

On November 30, 1999, the FCC adopted an Order granting additional numbering authority to the Connecticut Department of Public Utility Control ("CT DPUC") and distinctly noting that it granted this authority on an interim basis, and the forthcoming Order in the Numbering Resource Optimization proceeding will supersede all issued waivers. The numbering authority granted to the CT DPUC included authority to institute thousand-number block pooling trials; reclaim unused and reserved NXX codes and portions of these codes; and audit number assignment and utilization requirements.

Florida:

On September 15, 1999, the FCC adopted an Order partially granting additional numbering authority to the Florida Public Service Commission ("FL PSC") and distinctly noting that it granted this authority on an interim basis, and the forthcoming Order in the Numbering Resource Optimization proceeding will supersede all issued waivers. The numbering authority granted to the FL PSC included authority to: implement 1000-block pooling; reclaim unused and reserved NXX codes; post NPA relief rationing for six months; establish numbering allocation standards; require the submission of utilization data; and implement NXX code sharing. Authority to implement the following was denied: unassigned number porting; expansion of local number portability; data collection outside of the COCUS reporting; revise NXX code rationing procedures; and pre-NPA relief plan rationing. The FL PSC has established a Florida

Numbering Conservation Task Force in conjunction with its Investigation into Number Conservation Measures Docket, Docket No. 9814454. This task force has five Working Groups: Rate Center Consolidation, Pooling, Short Term Conservation Measures, Code Sharing, and Legal. These Working Groups were formed in November 1999, and no reports have yet been issued.

The FL PSC has also included number conservation as an issue in their outstanding area code relief dockets: Docket No. 990455-TL, Relief For The 305/786 Area Code; Docket No. 990456, Relief For the 561 Area Code; Docket No. 990457-TL, Relief For The 954 Area Code; and Docket No. 990517-TL, Relief for the 904 Area Code.

Georgia:

Meetings are currently being held by the Georgia Public Service Commission/Telco Industry Workshop regarding the Atlanta Metropolitan Local Calling Area Rate Center Consolidation ("RCC") Plan. Meetings to investigate the impacts of RCC are ongoing.

Illinois:

A pooling trial was started in the 847 NPA in July 1998. On June 30, 1999, the Illinois Commerce Commission ("ICC") issued an Interim Order in its Docket 98-0847, Petition for Approval of NPA Relief Plans for the 312, 630, 708 and 773 NPAs. This Order ordered the implementation of pooling using NPAC Version 1.4. (Release 1.4 was designed specifically for the Illinois number pooling trial and not national number pooling. Release 1.4 requires 1,000 times more storage than Release 3.0.) The implementation schedules are as follows: 603 NPA on July 15, 1999, 312 NPA on August 16, 1999, 773 NPA on October 1, 1999, and 708 NPA after the Y2K stabilization period. Overlays shall be implemented once NXX blocks are exhausted in these NPAs.

Maine:

On September 28, 1999, the FCC adopted an Order partially granting additional numbering authority to the Maine Public Utilities Commission ("ME PUC") and distinctly noting that it granted this authority on an interim basis, and the forthcoming Order in the Numbering Resource Optimization proceeding will supersede all issued waivers. The numbering authority granted to the ME PUC included authority to: implement 1000-block pooling; reclaim unused and reserved NXX codes; set numbering allocation standards; and enforce and audit carrier compliance with existing number utilization requirements. Authority to implement the following was denied: unassigned number porting and expansion of local number portability.

In its investigation into Area Code Relief Docket, Docket No. 98-634, the ME PUC requested comments on these various grants of authority. It issued an Order on November 4, 1999 ordering: implementation of 1000-block pooling using NPAC Version 1.4 by June 1, 2000; interim conservation measures including 75% fill ratios and initial code application requirements; and that all non-LNP carriers meet with the Commission Advisors to discuss what they can do to conserve numbering resources. A technical session was held on November 18, 1999 to begin the pooling process.

Massachusetts:

On September 15, 1999, the FCC adopted an Order partially granting additional numbering authority to the Massachusetts Department of Telecommunications and Energy ("MA DTE") and distinctly noting that it granted this authority on an interim basis, and the forthcoming Order in the Numbering Resource Optimization proceeding will supersede all issued waivers. The numbering authority granted to the MA DTE included authority to: implement 1000-block pooling; reclaim unused and reserved NXX codes; hear non-rationing procedure claims; post

NPA relief rationing for six months; and establish numbering allocation standards. Authority to implement the following was denied: unassigned number porting and revise NXX code rationing procedures.

On October 21, 1999, the MA DTE held a technical session to discuss pooling in Massachusetts. No pooling implementation date was set as a result of that meeting. The MA DTE has concerns regarding the use of NPAC Version 1.4 for pooling. On November 22, 1999, the MA DTE issued its First Set of Information Requests on the subject of pooling to all carriers in the Greater Boston MSA with responses due December 3, 1999.

The MA DTE is also investigating Rate Center Consolidation in its Docket D.T.E. 98-93. Bell Atlantic has filed its feasibility studies in RCC and the industry is awaiting the MA DTE's next action.

Missouri:

The Missouri Public Service Commission, on September 30, 1999, ordered rate center consolidation structure in the St. Louis area. Implementation of the new rate center was originally scheduled for December 31, 1999. This implementation date has been postponed until January 31, 2000.

New Hampshire:

On November 30, 1999, the FCC adopted an Order partially granting additional numbering authority to the New Hampshire Public Utilities Commission ("NH PUC") and distinctly noting that it granted this authority on an interim basis, and the forthcoming Order in the Numbering Resource Optimization proceeding will supersede all issued waivers. The numbering authority granted to the NH PUC included authority to: reclaim unused and reserved NXX codes; set numbering allocation standards, including the establishment of a requirement

that carriers demonstrate facilities readiness and setting fill rates; enforce and audit carrier compliance with number utilization reporting requirements; require the submission of utilization and forecast information to the NH PUC; and institute a thousands-block pooling trial. Authority to implement the following was denied: request to revise NXX code rationing and authority to implement unassigned number porting.

New York:

On September 15, 1999, the FCC adopted an Order partially granting additional numbering authority to the New York Public Service Commission ("NY PSC") and distinctly noting that it granted this authority on an interim basis, and the forthcoming Order in the Numbering Resource Optimization proceeding will supersede all issued waivers. The numbering authority granted to the NY PUC included authority to: implement 1000-block pooling; establish usage thresholds; reclaim unused and reserved NXX codes; and establish numbering allocation standards. On December 2, 1999, the NY PSC issued an Order ordering 1000-block number pooling in the 716 NPA with an implementation date of April 1, 2000 and wide area rate centers. These wide area rate centers would be available to all carriers and would be in addition to the rate center structure in place today. Technical meetings on both issues have been scheduled.

Ohio:

On November 30, 1999, the FCC adopted an Order partially granting additional numbering authority to the Ohio Public Utilities Commission ("OH PUC") and distinctly noting that it granted this authority on an interim basis, and the forthcoming Order in the Numbering Resource Optimization proceeding will supersede all issued waivers. The numbering authority granted to the OH PUC included authority to: set NXX code allocation standards; reclaim unused and reserved NXX codes and thousand-number blocks within those codes; investigate and order

the return of reserved and protected NXX codes; require sequential number assignment; and institute thousand-block pooling trials. Authority to implement the following was denied: adopt number rationing plans prior to reaching area code decision; implement service-specific and technology-specific NPA overlays; and require carriers to assign numbers from an NXX code to end users within six months from receiving the code.

Texas:

On November 30, 1999, the FCC adopted an Order partially granting additional numbering authority to the Public Utilities Commission of Texas ("PUC TX") and distinctly noting that it granted this authority on an interim basis, and the forthcoming Order in the Numbering Resource Optimization proceeding will supersede all issued waivers. The numbering authority granted to the PUC TX included authority to: institute thousand-block pooling trials; reclaim unused and reserved NXX codes and thousand-number blocks within those codes; require the submission of utilization and forecast information to the TX PUC; and require sequential number assignment.

Wisconsin:

On November 30, 1999, the FCC adopted an Order partially granting additional numbering authority to the Public Service Commission of Wisconsin ("PSC WI") and distinctly noting that it granted this authority on an interim basis, and the forthcoming Order in the Numbering Resource Optimization proceeding will supersede all issued waivers. The numbering authority granted to PSC WI included authority to: establish fill rates for growth codes; reclaim unused and reserved NXX codes and thousand-number blocks within those codes; investigate and order the return of reserved and protected NXX codes; require sequential number assignment; require submission of utilization and forecast information; audit carriers' use of

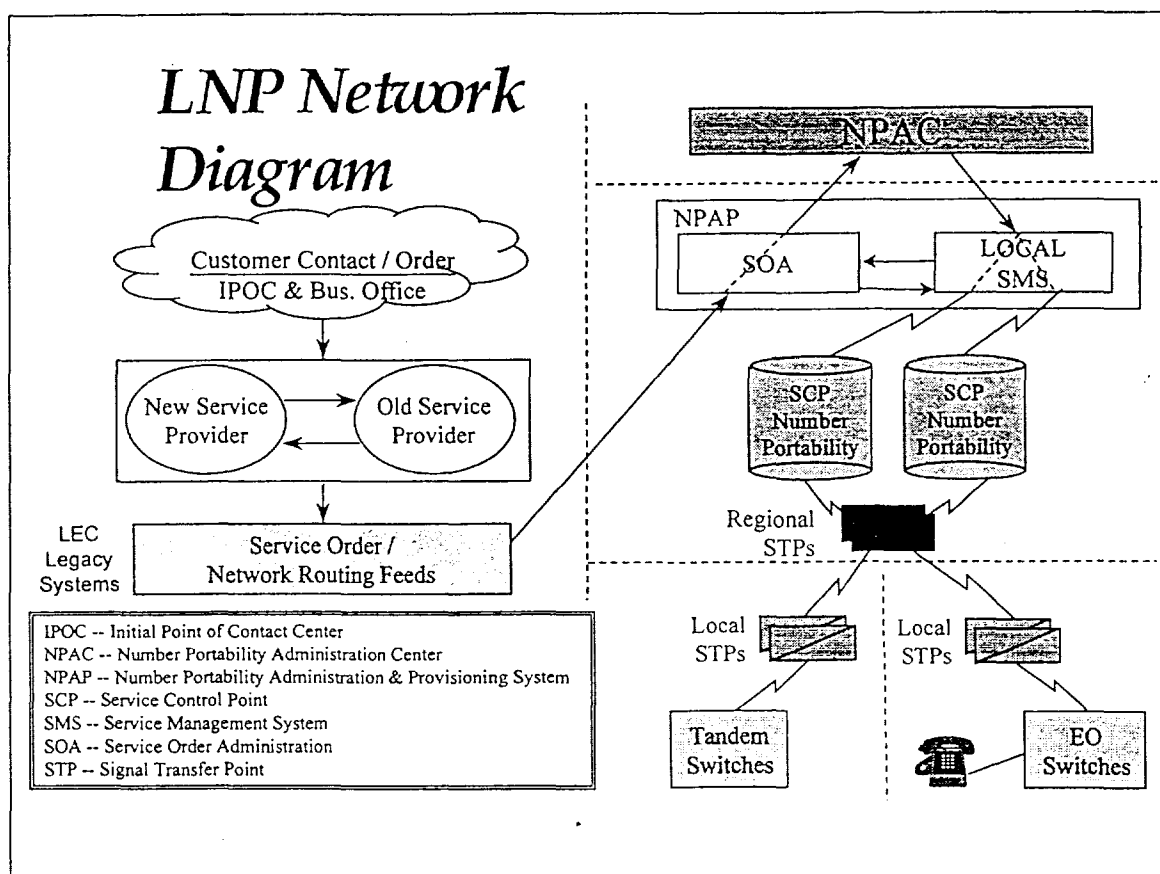
numbering resources; maintain rationing procedures for six months following area code relief; and institute thousands-block number polling trials. Authority to implement the following was denied: adopt number rationing plans prior to reaching area code decision; and require carriers to assign numbers from an NXX code to end users within six months from receiving the code.

ANALYSIS OF NUMBER CONSERVATION MEASURES

The following number conservation methods were evaluated by the Number Conservation Task Force to determine feasibility and applicability in Tennessee.

Thousand Block Pooling

Following is a diagram of the LNP network architecture that is used for Number Pooling call processing.



Thousand Block pooling, as the NPA NXX-X process is called, is a form of number administration.⁷ The NXX-X is assigned to a block holder who becomes responsible for the termination of calls to the unassigned and assigned numbers in the block until an assigned number is ported away. This is identical to the NPA NXX process for NXX code management.

⁷ FCC's DA 99-2634, Page 13, Paragraph 33, Released November 30, 1999.

Thousand Block pooling allows an NXX to be assigned to as many as 10 different Service Providers. For example the 615-624-XXXX may be assigned as follows:

615-624-1XXX -- Service Provider 1
615-624-2XXX -- Service Provider 2
615-624-3XXX -- Service Provider 3,
Etc.

In the initial development of number pooling, Lockheed Martin was asked to design an NPA NXX-X capability that would store the range (for example 624-1000 through 624-1999) plus a Location Routing Number (LRN). The format requested would be as follows: NPA NXX-1000-1999 plus an LRN. This information was requested as a one record storage with a download of one record from the NPAC to the service provider Local Service Management Systems ("LSMSs"). Lockheed Martin indicated that it could not meet the date for the Illinois number pooling trial with this one record capability. Instead Lockheed Martin developed a range type concept (called Release 1.4) that has 1,000 individual telephone numbers plus an LRN, creating 1000 records. Release 1.4 was designed specifically for the Illinois number pooling trial and not national number pooling.

Today, the LNPA Working Group including Lockheed Martin (now named NeuStar) has developed requirements for a Release 3.0 version for number pooling. Release 3.0 is designed to use Efficient Data Representation ("EDR"). EDR is the one-record-storage concept originally requested of Lockheed Martin. Release 1.4 requires 1,000 times more storage than does Release 3.0. Release 3.0 is considered the "National Standard" for number pooling. The Industry nationwide supports this national standard for number pooling.

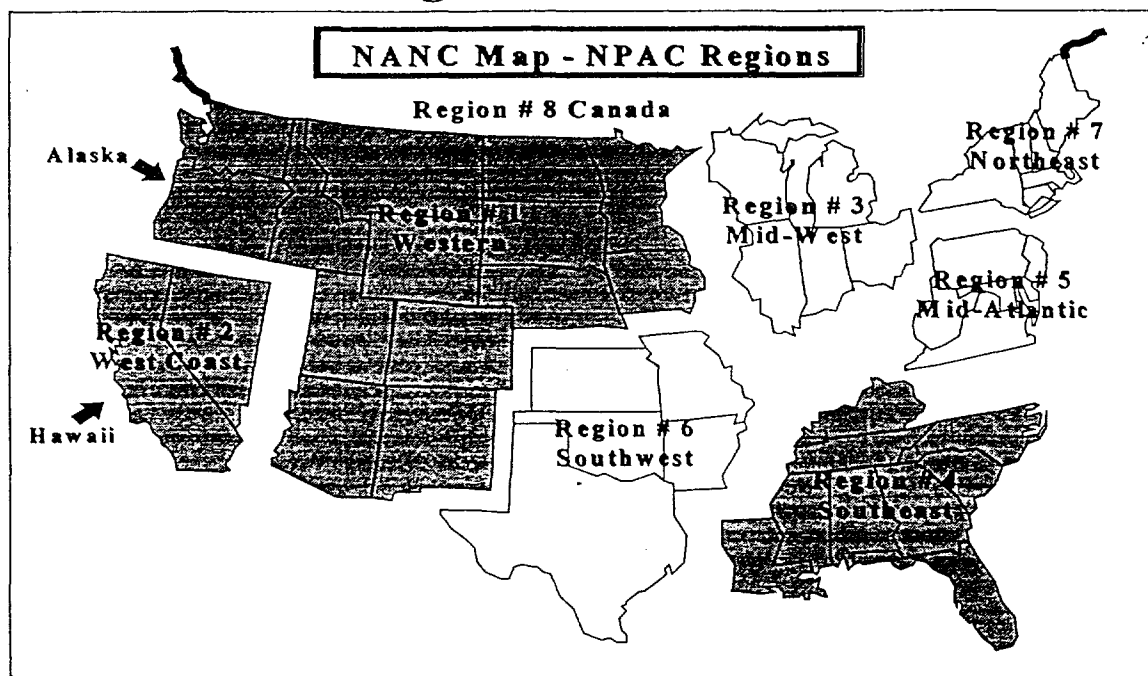
The national number pooling (Release 3.0) proposed schedule is as follows:

- SOA & LSMS Vendor Interface Testing
- Planned Start Date for Vendor Testing - April 17, 2000

- Service Provider Testing With NPAC
 - Planned Start Date for 1st Region - July 3, 2000
 - Estimated Time Required, 4-6 Months
- NPAC to Service Provider (SP) - Estimated 600 Test Cases
 - LNPA is Developing Test Plan/Strategy to Minimize Testing Time

Based on the above schedule, national number pooling should be ready for first region implementation during the October - November 2000 timeframe. The other six NPAC (Number Portability Administration Center) regions (shown below) should be able to implement Release 3.0 shortly after the first region completes implementation.

NPAC Regions



Number Pooling Prerequisites

There are prerequisites that are recommended for the implementation of number pooling. First, local number portability must be active in an area before number pooling implementation can occur. Second, Thousand Block Pooling as a number conservation measure is maximized if

Thousand Block Management has been implemented. Third, it is recommended that rate center consolidations be completed prior to number pooling.⁸ RCCs reduce the future demand for NXXs. Also if the RCCs are completed prior to number pooling, dual workloads are eliminated. Forecasting requirements are easier after the completion of RCC.

Number Pooling Implementation Process

Below are the recommended steps that need to be followed in order to implement number pooling. These steps include the following items:

1. **Select Number Pooling Administrator:** The Regulator and the industry need to select a number pooling administrator. The states already involved in number pooling have selected NeuStar to be the pooling administrator. After the pooling administrator is selected, the Regional LLC will need to establish a contract with the pooling administrator.
2. **Number Pooling Cost Recovery:** The FCC orders to date have required that the states determine the method to recover the costs of the pooling trial.⁹ The orders also indicate that the cost recover methods could follow that of Local Number Portability cost recovery.
3. **Regulatory Data Request for Pool Numbers:** After the selection of the pooling administrator, the Regulator will need to issue an order to prepare a data request. The data request should include vacant NXXs, vacant thousands blocks, and contaminated thousands blocks with less than 10% block contamination (if contaminated blocks are planned to be a part of the pooling process). The data request information will need to be sent to the pooling administrator by each service provider.

⁸ Because of countywide calling and extended area calling plans, some carriers may have difficulty consolidating rate centers. Rate Center Consolidation should be done in a revenue neutral manner.

⁹ FCC DA 99-2634, Page 13, Paragraph 33, released November 30, 1999.

4. **Service Provider Number Forecast:** All service providers will need to provide a number forecast for each respective number pooling NPA. This forecast needs to include all service providers whether or not the carrier uses thousands blocks or a full NXX. This data is needed by the pooling administrator and the NANPA to help project the NPA exhaust date. The forecast should be a part of the data request identified in Item 3 above.

5. **Select MSA Implementation Schedule:** In the FCC orders that have been issued to date, one MSA¹⁰ has to be selected for the pooling trial. The selection of the MSA needs to occur as early as possible in the pooling process. The MSA selected should meet certain criteria such as an area having LNP capability, having sufficient vacant NXXs to make pooling worthwhile (an estimated quantity is 100 vacant NXXs), and also an area of competition where multiple service providers are requesting NXXs.

It is recommended that there be six months between the first MSA implementation date and the second MSA. This allows time for the first time service providers in an area to resolve any technical issues with the number pooling process. After the second MSA, other MSAs could be implemented sequentially within a four-month period. This will allow time for determining the proper inventory of thousands blocks for the number pool.

All service providers need to be notified about the MSA implementation schedule. Also all new entrants need to follow the schedule and the requirements for number pooling.

6. **Select Type of Number Pooling:** There are the two types of number pooling, Release 1.4 and Release 3.0, which were discussed earlier. Release 1.4 was designed for the Illinois number pooling trial and Release 3.0 is the national standard that should be ready for deployment in the first NPAC region during the October-November timeframe of 2000.

¹⁰ FCC 99-249, Page 9, Paragraph 18, released September 15, 1999.

7. **Identify All Involved Service Providers:** Prior to the number pooling trial, all service providers need to be notified and be participants in the data request process. Also, any new entrants need to provide the data request information to the Pooling Administrator.

8. **Service Provider's Legacy/OSS Systems Ready Dates:** Service Provider Legacy or Operational Support Systems ("OSSs") need to be upgraded to support number pooling. Critical systems like the number administration systems need to be upgraded to handle the NXX-X format. The existing systems were designed to handle a full NXX and not the thousands block capability. If the service providers are not allowed to upgrade their OSSs, two customers could be assigned the same number because the donating service provider's legacy system did not realize that the number belonged to another service provider. This is a critical consumer confusion issue that the FCC identified in its New Hampshire order.¹¹

9. **Establish First MSA Implementation Schedule:** Once all of the input from Items 1-8 has been completed, an implementation timeline needs to be established for the selected NPA for the number pooling trial. The schedule should establish the implementation date for the number pooling trial.

10. **Regulator Issue Number Pooling Order:** After items 1-9 have been completed, the state Regulator needs to issue its number pooling order with the proposed schedule and first NPA implementation date.

Number Pooling Cost Recovery

Number Porting and Number Pooling are not the same. Porting is discussed in this number conservation context because it is required for carriers to do Number Pooling. In addition, it should be noted that the FCC has recommended that the states consider LNP cost

¹¹ FCC DA 99-2634, Paragraph 32, Page 13, released November 30, 1999.

recovery methodology as the cost recovery method for Number Pooling. Porting is the process of porting a ten digit telephone number ("TN") from one carrier (the block holder or code holder) to another carrier. Once a number is ported away from the block holder or code holder the number is considered ported. Once the number is disconnected and no longer used by the customer, the number snaps back to the block holder or code holder, and the number is no longer considered ported.

Number pooling¹² is the process of allocating an NPA NXX to carriers using the NPA NXX-X methodology and is considered by the FCC to be a numbering administration function. The NPA NXX process prior to pooling is a six-digit process. The NPA NXX-X process associated with number pooling is a seven-digit process. Pooled numbers are not considered ported numbers until the number is ported away from the block holder. Number pooling does use the Local Number Portability (LNP) Location Routing Number (LRN) architecture for call processing.

Three types of cost recovery items were identified by the Numbering Resource Optimization Notice.¹³ The types were: (1) shared industry costs; (2) carrier specific cost directly related to thousands block pooling implementation; and (3) carrier specific costs not directly relating to thousands block pooling implementation.

Shared Industry Costs would include the NPAC costs for number pooling and the costs for the pooling administrator. The directly related carrier specific costs for number pooling would include the OSS modifications, the LSMS and SCP database upgrades, any SS7 network upgrades, and any network switching software upgrades.

¹² Number Pooling web site - www.numberpool.com

¹³ FCC DA 99-2634, Paragraph 33, Page 13, Footnote 66, released November 30, 1999.

One issue that exists is that of the cost allocation of the shared NPAC and pooling administrator costs. Should the same cost allocation be used as that which was used for local number portability? The state Number Pooling Cost Recovery Workshop should immediately begin working this issue.

How should the cost for number pooling be recovered? Should the cost be recovered through an additional end user surcharge? These questions need to be addressed by the Cost Recovery Workshop.

Measures To Consider After Further Study

The following methods studied by NRO and other industry groups to achieve number resource optimization are considered by the Tennessee Numbering Task Force as having some possible, though limited application for number conservation.

1. Rate Center Consolidations (RCC):

- The combination of two or more contiguous rate centers into one rate center.
- RCC must be done in a revenue neutral basis and must consider provisions of the Tennessee 1995 Telecom Act with regard to basic service pricing.
- RCC may not be practical in all areas, but could be examined as a potential number optimization measure. If implemented, RCC should not delay the implementation of number pooling.
- RCC should be less costly to implement than number pooling, and could increase the potential benefits of number pooling.

2. Mandatory 10-Digit Dialing:

The requirement that all calls in the North American Numbering Plan, whether local or long distance, be dialed using the three-digit area code and seven-digit phone number.

- With mandatory 10-digit dialing to foreign NPAs, the need to protect some NXXs to avoid dialing conflicts is eliminated. Protected codes are not needed, so Central Office NXX resources are maximized.

- Mandatory 10-digit dialing to foreign NPAs could be implemented to postpone NPA exhaust.
- Mandatory 10-digit dialing of all local calls and the unblocking of the "d" digit are not recommended at this time.

3. Modification of Central Office (CO) Code Assignment Guidelines:

Proposed changes to CO code guidelines that help to ensure prudent use of NANP resources.

- Industry workgroups (Industry Numbering Committee, NANC Working Groups) are in the process of modifying the CO Code Assignment Guidelines and the reporting processes for the reporting of number utilization and forecast data. In addition, audit requirements for users of number resources are currently under development.
- Tennessee service providers should adopt these revised guidelines when they are completed at the national level.

Measures Considered But Not Recommended

The following methods studied by NRO and other industry groups to achieve number resource optimization are not recommended by the Tennessee Numbering Task Force for the specific reasons listed below.

1. NXX Voluntary Allocation Plan:

Voluntary allocation/rationing plan for NXX code assignment.

- Inconsistent with Tennessee public policy of fostering competition.
- NXX code rationing, either voluntary or mandatory, should only occur when it is clear that an NPA will run out of NXX codes before implementation of a relief plan, not in lieu of a relief plan. See Pennsylvania Order at ¶ 24 ("the rationing of NXX codes should only occur when it is clear that an NPA will run out of NXX codes before implementation of a relief plan").¹⁴

¹⁴ PUC of Texas in Project Number 20057, ordering paragraph 2a, dated 9/3/99 ordered relief of the 409 area code and ordered NANPA to convene an Industry meeting to "establish a voluntary NXX allocation plan to preserve the number of available NXX codes for future use in the area retaining the 409 NPA." This measure was taken to ensure an adequate number of codes were available until the area code plan was implemented.

- Limits the availability of NXX codes to all industry segments thus restricting service providers to meet the demands of consumers.
- Workable only if every service provider voluntarily commits to the limitation of NXX code assignment.

2. Inconsistent Rate Centers:

The ability for a service provider to draw rate center boundaries different than the incumbent and/or state service providers in the LATA.

- Not compatible with number pooling since number pooling is on a per rate center basis.
- Potential billing issues would need to be identified and resolved.

3. Location Portability:

The ability for a customer to retain a number when moving to another location outside the original rate area.

- Location portability is not technically feasible at this time.
- Technical requirements do not exist.

4. NXX Code Sharing:

Division of an NXX Code among two or more service providers using seven-digit routing in switches.

- Technically and administratively difficult to do.
- Number pooling using LNP infrastructure is more viable solution.

5. Individual Telephone Number Pooling:

The allocation of individual telephone numbers from a common pool(s) by a neutral administrator using Local Routing Number, Local Number Portability.

- Industry focus has been on thousand block pooling because of shorter time frame for implementation.
- ITN implementation is a minimum five-six years away.

6. Specialized Or Technology Specific Overlays:

Creation of an overlay for service providers who fail to meet, or are exempt from, specific technical requirements.

- Inefficient because they may result in an immediate request for additional NPAs and may result in stranded resources within the NPA.
- Technology or wireless specific overlays are simply not maintainable in a number portability environment where wireless to wireline porting is required.
- Technology specific overlays are not competitively neutral.

7. Extended Local Calling:

The ability for CMRS carriers to extend local inbound calling over a wider geographic area typically without the use of additional NXXs.

- Extended local calling areas do not create any new numbering resources.
- Extended Local Calling is achieved through reverse toll billing which is a business arrangement among carriers.
- Extended Local Calling Areas may have an adverse impact on the implementation of Local Number Portability.
- Wide area rate centers, as recently ordered by New York, (see page 17) are the preferred method.

8. Unassigned Number Porting:

The transfer of telephone numbers from one service provider's inventory to another service provider under the direction of a neutral coordinator, using LRN LNP.

- The Industry Numbering Committee, a subcommittee of the Alliance for Telecommunications Industry Solutions, is currently evaluating the pros and cons of unassigned number porting.
- In the recent grant of authority to various states, the FCC has only granted the authority to do unassigned number porting on a voluntary basis.
- Unassigned number porting should only be considered after national guidelines have been issued.

TASK FORCE RECOMMENDATION

On December 7, 1999 the Directors of the TRA deferred implementing an area code relief plan for 615 due to reclamation of unused NXX codes and an overall decrease in the demand for codes. Based upon this decision and the analysis of all known Number Conservation Measures being implemented and/or evaluated across the nation, the Tennessee Number Conservation Task Force recommends Thousand Block Pooling, Thousand Block Management, and All Services Overlay as the most effective means for conservation of numbering resources in Tennessee.

Thousand Block Management

It is recommended that Thousand Block Management be ordered for all service providers operating in Tennessee.¹⁵ Thousand Block Management is the process by which service providers assign numbers from a contaminated thousands block of an NXX before opening any other thousands blocks for assignment based on service requirements and customer needs. Thousand Block Number Pooling as a number conservation measure is maximized if Thousand Block Management has been previously implemented.

Thousand Block Pooling¹⁶

The NRRI analysis commissioned by this Task Force, suggests that enough uncontaminated thousand block resources may be available in the 615 and 901 area codes to support number pooling based upon June 1999 data (*see* Attachment 2). This data was not rate center specific and therefore additional analysis is necessary to determine the feasibility of

¹⁵ It is noted that the Authority's jurisdiction does not extend to CMRS carriers. However, it is anticipated that such carriers would voluntarily participate in Thousand Block Management.

¹⁶ Many rural ILECs have not implemented LNP because they have had no bona fide request to do so. Number Pooling should not be mandated for these companies until such time as they receive a bona fide request and become LNP capable in accordance with current FCC rules.

number pooling. Additionally, the NRRI analysis indicates there were six LNP capable carriers in the Nashville and Memphis rate centers (the primary markets for 615 and 901) as of June 1999. It is recommended that a detailed analysis of uncontaminated thousand blocks and LNP capable carriers be conducted by the Pool Administrator. A final determination on the effectiveness of Thousand Block Pooling as a number conservation measure prior to implementation is needed.

Number Pooling is a national issue. It is extremely critical that a uniform architecture be implemented that will provide pooling everywhere in the country with consistent results. Industry standards and guidelines will ensure a consistent number pooling outcome.

- As previously explained, it is recommended that Release 3.0, the national standard, be used for any implementation of number pooling in the State of Tennessee. Release 1.4 is not recommended because of the near term availability of Release 3.0 and the unnecessary costs that would be borne by Tennessee consumers for implementation of both releases.
- It is also recommended that a Number Pooling Cost Recovery Workshop be established if number pooling is considered for Tennessee.
- It is recommended that the Number Pooling 10-step process identified in this document be used for number pooling implementation in the State of Tennessee.

All Services Overlay¹⁷

From a viewpoint of number optimization, it is recommended that the NPA overlay be considered as the relief mechanism of choice for future NPA relief efforts. An overlay allows maximum use of the resources of the new NPA for the simple reason that all the assignable NXXs in the new NPA are available for assignment throughout the entire area being relieved.

¹⁷ MCI WorldCom, Inc. does not advocate a preference for overlays as a method of area code relief, but rather, that area code relief should be evaluated on a case-by-case basis.

With an overlay, there are no protected codes that must be set aside to protect seven-digit local dialing.

- Overlays may be implemented more quickly, and are easier and less confusing as well as less costly to consumers than other forms of relief.
- With an overlay, there is minimal impact or financial burden on existing customers – customer number changes are not required.
- Although the level of public response to the 615 area code relief plan was low, nonetheless it was three-to-one in favor of the overlay. In addition, all affected E911 Boards responding to the TRA indicated support for the overlay as well as a number of community leaders.

NUMBER CONSERVATION TASK FORCE MEMBERS

Ellen Bryson, Chair
TN Telecommunications Association

Teresa Newkirk
Time Warner Telecom

Bill Brown
BellSouth Mobility

Eddie Roberson
TN Regulatory Authority

Lewis DeBoard
TN Regulatory Authority

Dana Shaffer
NEXTLINK

Kelly Faul
MCI/WorldCom

Patsy Stow
BellSouth

John Feehan
TDS TELECOM

Laura Sykora
SPRINT

Richard Guepe
AT&T

Jim Wingo
TEC

Hoke Knox
SPRINT

Carolyn Marek
Time Warner Telecom

TENNESSEE NUMBER CONSERVATION TASK FORCE REPORT

Analysis of Number Utilization from NRRI compiled data¹⁸

| Tennessee NPAs | Number of NXXs Assigned | Number of NXXs Reported | Percent of Assigned NXXs Reported | Number of Uncontaminated 1000 Blocks (1) |
|----------------|-------------------------|-------------------------|-----------------------------------|------------------------------------------|
| 423 | 692 | 493 | 71% | 447 |
| 615 | 548 | 431 | 79% | 582 |
| 901 | 561 | 410 | 73% | 435 |
| 931 | 310 | 205 | 66% | 320 |

(1) Uncontaminated Blocks of the NXXs reported as of June, 1999

¹⁸ Inclusion of this information in the report was by general consensus as defined in the footnote on page 3, the TRA Staff suggested that number utilization information be included or attached.

BEFORE THE TENNESSEE REGULATORY AUTHORITY

NASHVILLE, TENNESSEE

RECEIVED

December 12, 2000 CONSUMER SERVICES DIVISION

DEC 12 2000

IN RE:

TELEPHONE NUMBERING POOLING

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TN REGULATORY AUTHORITY

DOCKET NO. 00-00851

**ORDER IMPLEMENTING 1000 NUMBER-BLOCK POOLING
IN THE 615 AND 901 AREA CODES**

At a regularly scheduled Authority Conference held on September 26, 2000, the Directors of the Tennessee Regulatory Authority ("Authority" or "TRA"), acting pursuant to authority expressly delegated to the TRA by the Federal Communications Commission ("FCC"), voted unanimously to open this docket for the purpose of implementing thousand-block number pooling (hereinafter referred to as "1K Pooling") in the 615 and 901 area codes. The implementation of 1K Pooling is necessary to promote the efficient use of Tennessee's numbering resources, thereby reducing the depletion of Tennessee's 901 and 615 area codes while providing sufficient telephone numbering resources to meet the expected demand by the public and all telecommunications service providers.

**ATTACHMENT
B**

BACKGROUND

Like many other states, Tennessee is experiencing the ever-increasing need to add new area codes within the state due to a shortage of available central office codes or NXX codes.¹ This shortage is most acute in the 615 and 901 area codes. The prime cause of this problem is the under-utilization of telephone numbers assigned to telecommunications service providers. A national study has revealed that practices utilized for the nationwide assignment of telephone numbers are no longer efficient or practicable. It is estimated that in many instances less than half of the numbers made available to carriers are actually utilized.² The utilization of numbers by providers in Tennessee is comparable to the number utilization rates found in the national study.

Through its own research and investigation, the Authority has determined that a primary factor contributing to the under-utilization of telephone numbers is the inefficient practice of allocating numbers in pre-determined blocks of 10,000 numbers without taking into account the actual demand for individual numbers. Assigning central office codes in blocks of 10,000 numbers, a practice established when one provider maintained a monopoly, is no longer viable in today's environment of competition in the telecommunications marketplace. The historic method of assigning numbers in 10,000 blocks has resulted in a rapid depletion of numbering resources, thereby contributing to the need for the additional area codes. The constant addition of new area codes is not only confusing but also costly to consumers as well as to the telecommunications industry.

¹ "Central Office code" or "NXX code" refers to the second three digits of a ten digit telephone number in the NPA-NXX-XXXX, where N represents any one of the numbers 2 through 9 and X represents any one of the numbers 0 through 9. See, 47 C.F.R. § 52.7(c).

² The North American Numbering Plan Administrator ("NANPA") estimates that utilization of numbering resources range between 5.7% to 52.6%, depending upon the industry sector (NANPA Report to the FCC, February 12, 1999).

Action taken by the Tennessee Regulatory Authority

In recognition of the telephone numbering problems in Tennessee, the Authority has taken specific action designed to implement long-term solutions for area code relief. Throughout this process, the Authority has solicited and obtained the assistance of the telecommunications industry and the public. The Authority has taken steps to delay the depletion of the 615 area code and therefore has temporarily deferred a relief decision for the 615 area code due to the numbers remaining until exhaust.³ Nevertheless, the continuous depletion of numbering resources demonstrates the need to find a solution to the numbering problems, other than merely adding new area codes.

On February 1, 1999, the Authority commissioned the Tennessee Telecommunications Association ("TTA") to form a Number Conservation Task Force ("Task Force") to research options and make recommendations relative to measures that may be taken for numbering resource conservation.⁴ The Task Force's findings were delivered to the Authority in December 1999 and included the recommendation that number pooling be implemented in Tennessee when the 3.0 version of pooling software is released by NeuStar.⁵

At an Authority Conference held on October 12, 1999, the Directors of the Authority unanimously resolved to petition the FCC for authority to implement number conservation measures, including, but not limited to, thousands-block pooling and NXX code reclamation. In conjunction with this action, on October 15, 1999, the Authority issued a Request to all affected and relevant Tennessee telecommunications service providers, including cooperatives, to consider taking voluntary measures toward area code conservation, including, but not limited to,

³ According to the North American Numbering Plan Administrator ("NANPA"), 160 central office codes remain available for assignment in the 615 area code as of October 2000.

⁴ The Task Force is composed of both wireline and wireless carriers and Authority Staff. The National Regulatory Research Institute ("NRRI") assisted the Task Force with a number utilization study.

⁵ *Report and Recommendations of the Number Conservation Task Force to the Tennessee Regulatory Authority*, December 30, 1999, p. 21.

voluntarily reviewing their numbering inventories and voluntarily returning non-utilized or otherwise dormant NXX codes to NANPA.⁶ This Request was served on thirty-two (32) wireless carriers and Incumbent Local Exchange Carriers (ILECs) and Competing Local Exchange Carriers (CLECs) authorized to conduct business in Tennessee. While this Request for voluntary return of unused NXX codes was somewhat successful in the 615 area code, very few codes were returned in the 901 area code. In fact, carriers increased their requests for NXX code assignments in the 901 area code thereby accelerating the depletion of NXX codes and causing the 901 area code to reach jeopardy status sooner than anticipated.⁷

At the Authority Conference held on December 7, 1999, the Directors of the Authority voted unanimously to request NANPA to conduct a meeting of all telecommunications service providers in Tennessee for the purpose of developing an industry voluntary allocation plan for NXX code assignment in the 615 and 901 area codes.⁸ The objective of the voluntary plan would be to extend the life of both the 615 and 901 area codes until the fourth quarter of 2003 by ensuring a steady and consistent allocation of NXX codes per month within the two area codes. The Directors further requested NANPA to report to the Authority, at the first conference in February 2000, the developments concerning the industry voluntary allocation plan. At the Authority Conference held on February 1, 2000, NANPA reported to the Directors that the telecommunications industry could not reach an agreement to institute a voluntary NXX code allocation plan.

⁶ *Request to All Affected Telecommunications Service Providers and Cooperatives in Tennessee to Take Voluntary Area Code Conservation Measures*, issued on October 15, 1999 in TRA Docket No. 99-00784.

⁷ An area code is declared in "jeopardy" by NANPA when there are insufficient NXX codes remaining to meet the expected demand until an area code relief plan can be selected by state regulators and implemented by the industry.

⁸ *Request to North American Numbering Plan Administrator to Develop an Industry Voluntary Allocation Plan and to Provide Periodic Reports to the Tennessee Regulatory Authority on NXX Code Requests*, TRA Docket No. 99-00784, December 10, 1999.

Notwithstanding the Authority's actions to improve utilization of the State's numbering resources, two of Tennessee's area codes, 901 and 615, have been declared to be in jeopardy by NANPA.⁹ NANPA estimates that the 901 and the 615 area codes will exhaust during the fourth quarter of 2001 and the second quarter of 2002, respectively. To address the jeopardy status in the most critical area code, the Authority acted on August 15, 2000, after a series of public hearings, to relieve the 901 area code by geographically splitting the existing area code and assigning a portion to the newly created 731 area code. Nevertheless, because of the increasing demands for numbers, this action will provide only temporary relief for the new 901 area code serving Shelby, Tipton and Fayette counties in Tennessee.¹⁰

The TRA's Delegated Authority from the FCC

The federal Telecommunications Act of 1996 (the "Act") grants the FCC exclusive jurisdiction over the North American Numbering Plan in the United States.¹¹ The FCC, however, has delegated specific authority to certain states to implement number conservation measures in the form of voluntary thousands-block number pooling trials and central office code rationing in certain cases. More recently, the FCC has issued two significant orders: *Numbering Resource Optimization, Report and Order and Further Notice Of Proposed Rule Making* (CC Docket No. 99-200, FCC 00-104) (March 31, 2000) (hereinafter referred to as the "*Numbering Resource Optimization Order*") and *FCC Order DA 00-1616* granting delegated authority to state regulatory commissions, released July 20, 2000 (hereinafter referred to as the "*Order Delegating Authority*").

⁹ On March 15, 2000, NANPA informed the Authority that it had declared the 901 area code in jeopardy. On July 17, 2000, the Authority was advised by NANPA that it had declared the 615 area code in jeopardy.

¹⁰ NANPA projects that the demand for numbering resources by new providers may result in the redefined 901 area code providing sufficient numbering resources only for four (4) additional years.

¹¹ 47 U.S.C. § 251(e)(1).

On November 16, 1999, the TRA filed a petition with the FCC seeking additional delegated authority to implement numbering conservation measures. Specifically, the TRA requested that the FCC delegate authority to the TRA to: enforce current and new numbering allocation standards; maximize the efficiency of number use practices within NXX codes by setting fill rates and by requiring utilization surveys; reclaim unused and reserved NXX codes and portions of those codes; order number utilization and forecast reporting and audit such reporting; and implement mandatory thousands-block number pooling.¹² In addition to the conservation measures requested in its petition, the Authority is currently investigating Rate Center Consolidation. In continuing to address long term solutions to the telephone numbering problems through conservation measures, the Authority has now become actively involved with NANPA for NXX Reclamation as authorized by the FCC's Order.¹³

On July 20, 2000, the FCC granted, in part, Tennessee's Petition for Additional Delegated Authority, specifically approving the TRA's request to implement thousands-block pooling.¹⁴ In delegating authority to implement 1K pooling trials to a number of states, including Tennessee, the FCC recognized:

Numbering resource optimization measures are necessary to address the considerable burdens imposed on society by the inefficient use of numbers; thus, we have enlisted the state regulatory commissions to assist the FCC in these efforts by delegating significant authority to them to implement certain measures within their local jurisdictions... [T]he state commissions, to the extent they act under the authority delegated herein, must ensure that numbers are made available on an equitable basis; that numbering resources are made available on an efficient and timely basis; that whatever policies the state commissions institute with regard to numbering administration not unduly favor or disfavor any particular telecommunications industry segment or group of telecommunications

¹² *Petition of the Tennessee Regulatory Authority for Additional Delegated Authority to Implement Numbering Conservation Measures*, FCC NSD File No. L-99-94 (November 16, 1999).

¹³ Report and Order and Further Notice of Proposed Rule Making, FCC 00-104, In the Matter of Number Resource Optimization, CC Docket No. 99-200, March 31, 2000, Para. 237 ("*Numbering Resource Optimization Order*").

¹⁴ *Order*, FCC, DA 00-1616, In the Matter of Numbering Resource Optimization, CC Docket No. 99-200, July 20, 2000, Para. 47 ("*Delegated Authority Order*").

consumers; and that the state commissions not unduly favor one telecommunications technology over another.¹⁵

The FCC noted further,

Although we are giving the state commissions tools that may help to prolong the lives of existing area codes, the state commissions continue to bear the obligation of implementing area code relief when necessary, and we expect the state commissions to fulfill this obligation in a timely manner.¹⁶

In its Order, the FCC states further that it did not rule on a number of aspects of the states' petitions, including Tennessee's petition, because "the *Numbering Resource Optimization Order* has already addressed these specific numbering resource optimization measures."¹⁷ The measures referred to in the *Numbering Resource Optimization Order* include: reclamation of unused or reserved NXX codes, industry reporting requirements and utilization forecasting, sequential number assignments, facilities readiness, and fill rates. The *Numbering Resource Optimization Order* establishes that 1K Pooling be accomplished in accordance with the Industry Numbering Committee ("INC") Guidelines,¹⁸ and that unused 1000 blocks, as well as 1000 blocks with less than ten percent (10%) contamination,¹⁹ be donated by pooling carriers to the number pooling administrator.²⁰ In addition, the *Numbering Resource Optimization Order* calls for Sequential Number Assignment by carriers unless the carrier can demonstrate to the state that a new block needs opening to fulfill a customer's request.²¹

In its *Delegated Authority Order*, the FCC specified that "state commissions with thousands-block number pooling authority are responsible for thousands-block number pooling

¹⁵ *Delegated Authority Order*, July 20, 2000, Para. 10.

¹⁶ *Delegated Authority Order*, July 20, 2000, Para. 11.

¹⁷ *Delegated Authority Order*, July 20, 2000, Para. 5.

¹⁸ *Numbering Resource Optimization Order*, March 31, 2000, Para. 183.

¹⁹ "Contamination" refers to telephone numbers have been assigned and are working within a particular 1K block.

²⁰ *Numbering Resource Optimization Order*, March 31, 2000, Para. 191.

²¹ *Numbering Resource Optimization Order*, March 31, 2000, Paras. 234 and 235.

administration” and that “[t]his responsibility includes the selection of a thousands-block number Pooling Administrator to allocate thousands-blocks to carriers within the area in the state where pooling is implemented...”²² The FCC has previously established preliminary guidelines for pooling and outlined the process for the national roll-out of pooling.²³ Any state that is granted additional delegated numbering authority to conduct interim pooling must comply with the national guidelines in such a manner that the transition will be seamless when the national roll-out occurs.²⁴

FINDINGS AND CONCLUSIONS

As a part of their deliberations on September 26, 2000, the Directors unanimously rendered specific findings as to the following five (5) issues that are inherent in exercising the delegated authority to implement interim thousand-block number pooling: (1) selection of an interim Pooling Administrator; (2) selection of pooling software to be used; (3) mandatory reclamation of under-used thousand number blocks; (4) treatment of pooling costs and (5) establishment of an implementation date.

1. Selection of an Interim Pooling Administrator

In its *Delegated Authority Order*, the FCC delegated to the TRA the Authority to select a pooling administrator for Tennessee that will be responsible for organizing and implementing the pooling trial, including the ongoing duty of fulfilling new number requests from carriers. The Authority’s selection of an interim Pooling Administrator will be superceded by the FCC when the FCC selects the national pooling administrator.²⁵

²² *Delegated Authority Order*, July 20, 2000, Para. 20.

²³ *Numbering Resource Optimization Order*, March 31, 2000.

²⁴ *Numbering Resource Optimization Order*, March 31, 2000, Para. 14.

²⁵ Even though the North American Numbering Council (“NANC”) recommended to the FCC that NeuStar be selected as the national Pooling Administrator, the FCC has subsequently determined that the process of appointing a national pooling administrator shall be bid competitively. *Numbering Resource Optimization Order*, March 31, 2000, Para. 146-148.

Upon being delegated the additional authority, the TRA began the process of selecting an interim state Pooling Administrator. Two companies, NeuStar and Telcordia Technologies ("Telcordia"), made presentations to the Authority concerning their qualifications to provide pooling administration. The Authority considers both companies to have the requisite technical capability and neutrality status to serve as an interim state pooling trial administrator. NeuStar submitted a cost estimate for its services as interim pooling administrator.²⁶ Telcordia agreed to conduct Tennessee's interim pooling trial within the 901 and 615 area codes until the national pooling administrator is selected by the FCC without imposition of costs. The Authority finds that the selection of Telcordia is in the public interest because Tennessee consumers will not incur interim pooling administrative costs. The Authority therefore appoints Telcordia as the interim Pooling Administrator for Tennessee.

2. Selection of Pooling Software

At the present time, telephone switches identify calls by looking at the first six (6) digits (area code + the central office code). Under this practice, only one carrier is identified with each central office code. This practice prevents carriers from sharing central office codes. Pooling, or the sharing of central office codes by multiple carriers, requires switching software that can process ten (10) digits. A 3.0 version of the pooling software designed to accomplish this activity in an efficient manner is presently being tested and should be available during the first quarter of 2001.

The use of 3.0 version software is more suitable for number pooling trials. First, the 3.0 version is more compatible with the national requirements of Local Number Portability ("LNP"), a prerequisite for number pooling. Second, the FCC has recommended using 3.0 for the national

²⁶ NeuStar requested that its estimate of pooling administrative costs be treated as proprietary information.

roll-out of pooling.²⁷ Finally, requiring the telecommunications industry to use the older 1.4 version and then convert to the 3.0 version, especially when it will be available in January 2001, is inefficient and increases the pooling implementation cost by adding a conversion expense. For the above reasons, the Authority finds that using 3.0 version of the pooling software is in the public interest and adopts 3.0 version for use in implementing number pooling.

3. Mandatory Reclamation of Under-Used 1K Number Blocks

For 1K Pooling to achieve its purpose of conserving telephone numbers, it is imperative that under-used 1000 number blocks be returned to the pooling administrator. Such action allows stranded, unused telephone numbers to be returned to the pooling administrator for assignment to other carriers requiring numbering resources. In Tennessee, it is especially important that telecommunications service providers operating in the 901 and 615 area codes all return under-used 1000 number blocks to the interim Pooling Administrator. Number utilization study results reported by the TTA in December 1999 revealed that 582 one thousand number blocks exist in the 615 area code that have less than ten percent (10%) contamination.²⁸ The TTA's number utilization study reveals that 1K blocks can be returned to the interim Pooling Administrator under mandatory reclamation so as to make pooling a viable number conservation effort.

In determining what constitutes under-used 1K blocks, the Authority uses the national standard of 10 percent (10%) contamination.²⁹ The Authority has determined that all telecommunications service providers capable of local number portability, not exempted by the

²⁷ FCC adopted the INC Pooling Guidelines for the national standard of TIS1.6 for pooling. Version 3.0 is the software that satisfies this technical requirement for 1K number block pooling. *Numbering Resource Optimization Order*, March 31, 2000, Para. 181.

²⁸ *Report and Recommendations of the Number Conservation Task Force to the Tennessee Regulatory Authority*, December 30, 1999, Attachment 2, p. 36.

²⁹ The FCC found that "donation of thousands-block with up to a ten percent contamination threshold has the potential to add significant numbering resources in areas where thousands-block number pooling has been implemented." *Numbering Resource Optimization Order*, March 31, 2000, Para. 191.

FCC, shall return to the interim Pooling Administrator all 1K number blocks where the assignment of numbers within a 1K block is equal to or less than 10 percent (10%).

4. Treatment of Pooling Costs

There are two kinds of costs associated with number pooling: administrative costs and implementation costs. Administrative costs are associated with the expenses of the Pooling Administrator. Implementation costs are expenses incurred by telecommunications service providers as a result of implementing 1K pooling. Tennessee will not incur administrative costs due to the selection of Telcordia.

The FCC's *Numbering Resource Optimization Order* provides that states authorized to implement interim pooling trials shall determine the method of recovery of all pooling costs.³⁰ Such recovery is governed by Section 251 of the Act which states that any recovery mechanism shall be competitively neutral.³¹ The FCC is expected to address the national pooling cost issues and develop a recovery mechanism expected to be similar to the mechanism utilized for local number portability.³²

Addressing Tennessee specific pooling costs at such a time when pooling is implemented will permit the Authority additional time to ascertain the FCC's position as to cost recovery on the national level. Further, addressing costing issues at this time could slow the implementation of number pooling, thereby impacting area code relief for the 615 area code. The Authority finds that cost recovery for interim pooling shall be addressed in a separate proceeding and directs Authority Staff to work with the telecommunications industry to develop a schedule for addressing interim 1K pooling cost recovery.

³⁰ *Numbering Resource Optimization Order*, March 31, 2000, Para. 171.

³¹ *Numbering Resource Optimization Order*, March 31, 2000, Para. 200.

³² *Numbering Resource Optimization Order*, March 31, 2000, Paras. 200 and 214.

5. Establishing an Implementation Date

The establishment of a realistic implementation date for interim number pooling provides the industry with a firm estimate of time for the activation of number pooling. In its *Report and Recommendation of the Number Conservation Task Force to the Tennessee Regulatory Authority*, the Task Force recommended that an implementation date be made part of the Authority's number pooling order.³³ Every state that has initiated a pooling trial has included an implementation date in its pooling order.

In determining a date for the commencement of number pooling, the Authority considered several factors. Due to the jeopardy status of the 901 and the 615 area codes, implementation of number pooling must be commenced as soon as practicable. The Authority considered that the 3.0 version of pooling software should become available during the first quarter of 2001. Furthermore, Tennessee's implementation date must fit within the FCC's limitation on pooling trials. The FCC has found that a staggered roll-out is necessary in order to prevent telecommunications network disruptions, and concluded that not more than three (3) Numbering Plan Areas ("NPAs") should be implemented within each Numbering Plan Area Code ("NPAC") region per quarter.³⁴

The Authority finds that the earliest date for implementing number pooling in the 615 area code should be March 1, 2001, contingent upon NeuStar releasing 3.0 version software prior to that implementation date. As a result of action previously taken by the Authority to reduce depletion of the 901 area code, implementation of 1K Pooling in the 901 area code is not as urgent as in the 615 area code. The Authority finds that number pooling in the 901 area code should be implemented not later than thirty (30) days prior to the mandatory dialing date for the

³³ *Report and Recommendation of the Number Conservation Task Force to the Tennessee Regulatory Authority*, December 30, 1999, page 25.

³⁴ *Numbering Resource Optimization Order*, March 31, 2000, Para. 159.

new 731 area code. These staggered number pooling implementation dates in Tennessee will allow the telecommunications service providers adequate time to plan and implement the necessary modifications to their networks.

IT IS THEREFORE ORDERED THAT:

1. Telcordia is selected as Tennessee's interim Pooling Administrator until such time as the FCC selects a national Pooling Administrator. Telcordia shall be responsible for entering into appropriate agreements with members of the telecommunications industry and with North American Portability Management, L.L.C.³⁵ and for conducting all required meetings and pooling activities.

2. Interim 1K Pooling Trials shall be conducted using the version 3.0 pooling software.

3. Interim 1K Pooling Trials shall be conducted in the 615 and 901 area codes and all Local Number Portability capable carriers in those areas shall participate in the number pooling trials.

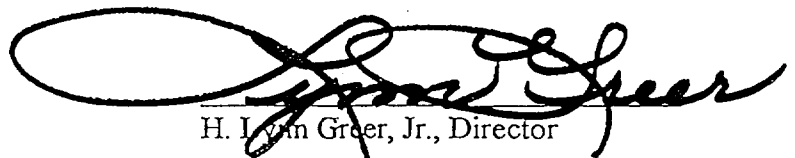
4. Interim 1K Pooling shall be implemented in the 615 area code not later than March 1, 2001, or upon the availability of version 3.0 pooling software, whichever is later. Interim 1K Pooling shall be implemented in the 901 area code not later than thirty (30) days prior to the date that mandatory dialing begins for the new 731 area code in West Tennessee.

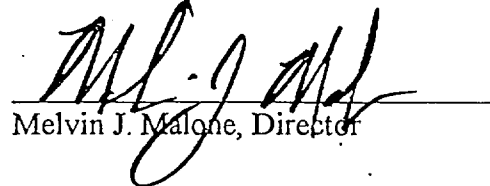
5. Pursuant to the authority delegated to the TRA by the FCC and as set forth in this Order, all Local Number Portability capable carriers assigned central office codes in the 615 and 901 NPAs are hereby required to: (1) initiate block protection for 1K blocks where number

³⁵ North American Portability Management, L.L.C. is the entity organized by and representing the telecommunications industry for the purpose of entering into agreements to conduct interim number pooling.

assignment is equal to or less than ten percent (10%); (2) donate under-used 1K number blocks to Tennessee's interim Pooling Administrator, and (3) initiate the practice of sequential number assignment according to a schedule which will be determined by Telcordia and members of the telecommunications industry in order to comply with the requirements of this Order.


Sara Kyle, Chairman


H. Lynn Greer, Jr., Director


Melvin J. Malone, Director

ATTEST:


K. David Waddell, Executive Secretary